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Wisconsin
Department of Commerce

**Wisconsin Department of Commerce PECFA Program**

**BID NUMBER: 06-53402-2903-14**

**PECFA number:** **53402-2903-14**
**BRRTS number:** **03-52-001470**
**Site Name:** **Spur Station #2433 (Former)**
**Site Address:** **414 Three Mile Road, Caledonia, WI**

Program contact: Linda Michalets, Site Review Hydrogeologist
Program contact address: 101 West Pleasant Street, Suite 205, Milwaukee, WI 53212
Program contact phone: 414-220-5376

## Questions and Responses

1. Is the site currently an operating gas station and convenience store?
**Yes. The three USTs were upgraded and are currently in use.**

2. Are the USTs, piping and dispenser pumps yet located in the positions depicted on the DPRA site maps?
**Yes. This is the current configuration of the USTs and dispenser pumps. The piping runs are presumed to be in the same locations as indicated on site figures.**

3. Are those USTs, piping and dispenser pumps yet in use? If those USTs, piping and dispenser pumps are yet in use, then has a determination been made as to whether or not those systems are themselves leading or contributing to the impacts observed to date?
**This site is an operating gas station. It is unknown whether the current system is contributing to impacts at the site. Comm 10 upgrade requirements are intended to minimize the potential for new releases. The owner uses inventory control and tightness testing of the tanks and pressurized piping for leak detection.**

4. Has any contaminated soil been removed from the site to date?
**Contaminated soil may have been removed during installation of the extraction system. Soil disposal documents were not provided to the Department.**

5. Based on the information in the documents provided to me by the Department of Commerce, the wells currently on-site are screened too deep to accurately define the actual magnitude and extents of perched groundwater contamination, meaning that the site investigation is incomplete. Do the Department of Commerce and the WDNR consider the site investigation to be complete?
**Section four of the bid specifications contain requirements that may be considered investigation, however, this project has been in the remediation stage for a number of years. This site has been a leaking underground storage tank site since 1991 and some remedial activities have been conducted.**

6. Based on the information in the documents provided to me by the Department of Commerce, I was not able to definitively determine whether or not any of the five COMM 47.337 environmental factors exist at this site. Do any of the five COMM 47.337 environmental [factors] exist at this site? If the answer is yes, then what specific factor or factors exist, and are bidders required to include remediation of those factors in their bid proposals?

**No environmental factors have been identified at this site.**

7. The Department of Commerce Bid document states that "The Department expects that remediation can be completed within the maximum reimbursable amount for this site". What is the total amount of eligible costs already expended to date on this site?

**A claim has not yet been submitted for this site. Based on the WDNR's disapproval of the use of previously installed remedial wells, it appears that a portion of activities conducted to date may be determined to be non-eligible for PECFA reimbursement at the time of claim review. Therefore, it is difficult to estimate the amount of eligible costs expended to date. However, as a petroleum marketer, the maximum reimbursable amount for this site should be $1 million.**

***Specific Questions Regarding The Items In SECTION 4: The WDNR's Site Specific Bid Specification Requirements***

**Item:** Hot-spot soil removal must be conducted to include, at a minimum, areas north and south of the tank basin.

8. Based on the information in the documents provided to me by the Department of Commerce, the actual "hot-spots" are most likely the soils beneath the dispenser pump area and the soils in the tank basin, and the areas north and south of the tank basin are only contaminated fringe areas. Does the WDNR intend "hot-spot" removal to mean soil removal from the actual "hot-spots" (i.e., where the dispenser pumps are currently located and from the tank basin itself) or is the WDNR's intended requirement actually from the areas north and south of the tank basin? If the WDNR's intended requirement is actually for soil removal from the areas north and south of the tank basin, then does the WDNR intend that to include the area south of the tank basin where the dispenser piping runs are currently located? In other words, would the WDNR please more accurately and clearly specify the areas where soil removal is required?

**The WDNR's *minimal* requirement is for areas north and south of the tank basin. The piping may have to be removed or replaced. Potential bidders should use the WDNR's minimal requirement as a starting point for a remedial proposal that they believe will bring this site to closure in a cost-effective manner.**

**Item:** VEP wells 1 through 9 cannot be used as monitoring wells for this site. At least five additional monitoring wells must be installed and properly screened: one upgradient (near VEP-1), two sidegradient (near VEP-9 and south of VEP-1) and two downgradient (east of VMP-2, and east of VMP-3, or across the street from VMP-3).

9. Based on the information in the documents provided to me by the Department of Commerce (specifically the DPRA water table contour maps from 10/14/98, 12/01/98 and 01/21/99), some of the specifications in the above item are inconsistent and even conflicting. Take the phrase 'one upgradient (near VEP-1)' for example. Based on the water table contour maps, VEP-1 is actually located in an intermediate position, upgradient of the tank basin "hot-spot" area but downgradient of the dispenser pump "hot-spot" area. Another example is the phrase 'two sidegradient (near VEP-9 and south of VEP-1)'. VEP-9 is not in a sidegradient position, VEP-9 is currently the furthest downgradient well. Would the WDNR please

reevaluate their stated installation locations for the five required wells and more accurately, consistently and clearly specify what those locations should be?

**Correction - the WDNR is requiring a monitoring well upgradient from VMP-1, not VEP-1, near the southwest corner of the property. In addition, the WDNR would like one well sidegradient from VEP-9 (installed northwest of VEP-9), most likely on the neighboring property. One well should be installed south of VEP-1 between the two grassy areas in the driveway to determine whether off-site migration is occurring. The other two wells should be installed east of VMP-2, at the property boundary and northeast of VMP-3, at the property boundary.**

**Item:** At least one year of quarterly groundwater monitoring will be required, with less frequent monitoring intervals after that. Monitoring of natural attenuation parameters must be included.

10. The list of parameters that could be analyzed to monitor for natural attenuation is very lengthy. Would the WDNR please specify the natural attenuation parameters that the WDNR wants monitored at this site?

**The WDNR is requiring that natural attenuation parameters include: dissolved oxygen, redox, soluble iron ($Fe^{+2}$) and temperature.**

**Item:** A utility trench investigation, particularly along the northern property border, must be performed.

11. Several underground utilities appear to be located near or along the northern property border in the DPRA drawings provided to me by the Department of Commerce. Those utilities include a water supply utility, a sanitary sewer, a natural gas utility, a cable television utility and a storm sewer. Would the WDNR please specify which utilities are to be investigated and provide some specification on how extensive or intrusive the desired investigation is expected to be?

**The WDNR is requiring that all utilities that are potential migration pathways for contamination be investigated. The investigation should provide information on the depths of the utility lines, which way sanitary/storm sewers are dipping, and if they intersect the groundwater table. Also, determine if the utility corridors are providing a direct pathway to any nearby receptor, such as a basement or other structure.**